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**From:** Pratt, Marirose [Pratt.Marirose@epa.gov]  
**Sent:** 2/18/2022 4:26:13 PM  
**To:** Kler, Denis [Kler.Denis@epa.gov]; Taylor, Kevin [Taylor.Kevin@epa.gov]; Russo, Todd [Russo.Todd@epa.gov]; Dressler, Jason [Dressler.Jason@epa.gov]; Mills, Andrew [mills.andrew@epa.gov]  
**CC:** Foley, Patrick [Foley.Patrick@epa.gov]  
**Subject:** RE: New Indy - comments on 114 initial response 2/10/2022  
**Attachments:** RE: Status Update - New-Indy Catawba LLC's Response to EPA Section 114 Information Request

Thanks, Denis.

All, after conferring with Denis, I consolidated his draft questions to New Indy and just emailed opposing counsel the attached. I will let you know when we get a response.

Have a great weekend!  
Marirose

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**From:** Kler, Denis <Kler.Denis@epa.gov>  
**Sent:** Wednesday, February 16, 2022 9:48 AM  
**To:** Taylor, Kevin <Taylor.Kevin@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Pratt, Marirose <Pratt.Marirose@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Mills, Andrew <mills.andrew@epa.gov>  
**Cc:** Foley, Patrick <Foley.Patrick@epa.gov>  
**Subject:** New Indy - comments on 114 initial response 2/10/2022

All,

**Ex. 5 DP / Ex. 7(A)**

Please review and let me know if you have any comments or questions. Also, please add any additional questions you may have.

Denis

\*\*\*\*\* Draft clarification questions \*\*\*\*\*

## General Process information

\*Monthly bleach production – provide information as why the data is not available prior to January 2007.

\*Monthly unbleached production - provide information as why the data is not available prior to January 2007.

\*Steam stripper bypass – 40 CFR Part 63 requires the owner or operator to maintain these records (see below). Provide information as to why these records are unavailable.

40 CFR 63.441 defines “Low volume, high concentration or LVHC system” as the collection of equipment including the digester, turpentine recovery, evaporator, steam stripper systems, and any other equipment serving the same function as those previously listed.

40 CFR 63.443(a)(1)(i) states that each LVHC system shall be controlled.

40 CFR 63.443(c) states that equipment systems listed in paragraphs (a) and (b) of this section shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in paragraph (d) of this section. The enclosures and closed-vent system shall meet the requirements specified in § 63.450.

40 CFR 63.443(e) states that periods of excess emissions reported under § 63.455 shall not be a violation of § 63.443(c) and (d) provided that the time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed the following levels:

(1) One percent for control devices used to reduce the total HAP emissions from the LVHC system;

40 CFR 63.450(d) states that each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §§ 63.443, 63.444, or 63.445 shall comply with either of the following requirements:

(1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to the manufacturer's specifications a flow indicator that is capable of taking periodic readings as frequently as specified in § 63.454(e). The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; or

(2) For bypass line valves that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.

40 CFR 63.454(b) requires the owner or operator to maintain the following records:

(11) the position and duration of opening of bypass line valves and the condition of any valve seals; and

(12) The duration of the use of bypass valves on computer-controlled valves.

40 CFR 63.454(d) The owner or operator shall set the flow indicator on each bypass line specified in § 63.450(d)(1) to provide a record of the presence of gas stream flow in the bypass line at least once every 15 minutes.

\*Monthly SO<sub>2</sub> emission records – It is the EPA’s understanding that the company maintains records of SO<sub>2</sub> captured by wood ash (daily records) and annual SO<sub>2</sub> emissions (monthly records and 12-month rolling sum records). Combination boiler #1 and combination boiler #2, are emission units that are part of the monthly SO<sub>2</sub> emission calculations. Provide information as to why these records are unavailable.

\*Monthly quantity of SOGs incinerated – Provide information as to how monthly SO<sub>2</sub> emissions from combination boiler #1 and combination boiler #2 are calculated without knowing the amount of SOGs incinerated in the boilers.

\*Monthly quantity of NCGs incinerated – Provide information as to how monthly SO<sub>2</sub> emissions from combination boiler #1 and combination boiler #2 are calculated without knowing the amount of NCGs incinerated in the boilers.

## 40 CFR Part 63 Subpart S

\*Annual pulping system closed collection system method 21 evaluations – Provide information as to why the records are unavailable prior to 2014.

\*Monthly condensate closed collection system inspections – Provide information as to why the records are unavailable prior to 2014.

\*Annual condensate closed collection system method 21 evaluations – Provide information as to why the records are unavailable prior to 2014.

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